

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

The Michelin Retirement Plan and the Investment Committee of the Michelin Retirement Plan,

Plaintiffs,

v.

Dilworth Paxson, LLP, BFG Socially Responsible Investments, Ltd., Burnham Financial Group, Inc., Burnham Securities, Inc., COR Fund Advisors, LLC, GMT Duncan, LLC, Greenberg Traurig, LLP, Thorsdale Fiduciary and Guaranty Company Ltd., U.S. Bank National Association, Valor Group Ltd., Wakpamni Lake Community Corp., Wealth-Assurance AG, Wealth Assurance Private Client Corporation, Timothy B. Anderson, Jon Michael Burnham, Devon D. Archer, Bevan T. Cooney, Hugh Dunkerley, Jason W. Galanis, John P. Galanis, Gary T. Hirst, Frankie D. Hughes, and Michelle A. Morton,

Defendants.

Case No. 6:16-CV-03604-HMH-JDA

AFFIDAVIT OF J. DERRICK QUATTLEBAUM

Personally appeared before me J. Derrick Quattlebaum who, after being sworn, deposes and states that:

1. Pursuant to Federal Rule of Civil Procedure 4(d), and by letter dated November 22, 2016, the above-captioned Defendant Valor Group, Ltd. was notified of the commencement of this action, provided with a copy of the Complaint as well as Plaintiff's Responses to Local Rule 26.01 Interrogatories, and provided with a Waiver of Service. A true and accurate copy of the letter, excluding attachments, is attached hereto as Exhibit A.

2. Defendant Valor Group, Ltd. failed to return the Waiver of Service and was therefore served by personally delivering the Summons, Complaint and Plaintiff's Responses to Local Rule 26.01 Interrogatories on February 7, 2017, to Hugh Dunkerley as an officer of Defendant Valor Group, Ltd pursuant to Rule 4(h)(1)(B) of the Federal Rules of Civil Procedure as evidenced by the Affidavit of Service attached hereto as Exhibit B (ECF No. 95-2). At the time of service, as confirmed in the Affidavit of Service (Exhibit B), Mr. Dunkerley confirmed to the server that he was authorized to accept service on behalf of the Defendant Valor Group, Ltd.

3. Defendant Valor Group, Ltd.'s response to the Summons and Complaint was due on or before February 28, 2017.

4. Defendant Valor Group, Ltd. has failed to answer, move or otherwise respond to the Complaint.


J. Derrick Quattlebaum

Sworn to and subscribed before me this

10 day of March, 2017



Melodie L. Watson

Notary Public for South Carolina

My Commission Expires: 5-31-2022

